

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,  
CALIFORNIA STATE TEACHERS' RETIREMENT  
SYSTEM, SONTERRA CAPITAL MASTER FUND, LTD.,  
FRONTPONT PARTNERS TRADING FUND, L.P., AND  
FRONTPONT AUSTRALIAN OPPORTUNITIES TRUST  
on behalf of themselves and all others similarly situated,

Docket No. 13-cv-02811(PKC)

ECF Case

Plaintiffs,

– against –

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS  
CAPITAL INC., BNP PARIBAS S.A., CITIGROUP, INC.,  
CITIBANK, N.A., COÖPERATIEVE CENTRALE  
RAIFFEISEN-BOERENLEENBANK B.A., CRÉDIT  
AGRICOLE S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE  
BANK AG, DB GROUP SERVICES UK LIMITED, HSBC  
HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, ICAP  
EUROPE LIMITED, J.P. MORGAN CHASE & CO.,  
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF  
SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND  
JOHN DOE NOS. 1-50,

Defendants.

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT WITH DEUTSCHE BANK AG AND DB GROUP SERVICES  
(UK) LTD., SCHEDULING HEARING FOR FINAL APPROVAL OF PROPOSED  
SETTLEMENTS WITH BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS  
CAPITAL INC., HSBC HOLDINGS PLC, HSBC BANK PLC, DEUTSCHE BANK AG,  
AND DB GROUP SERVICES (UK) LTD., AND APPROVING THE PROPOSED FORM  
AND PROGRAM OF NOTICE TO THE CLASS**

**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law, the  
Declarations of Vincent Briganti, Esq., Christopher Lovell, Esq., and The Honorable Daniel  
Weinstein (Ret.), and the exhibits attached thereto, including the Settlement Agreement  
("Settlement"), and the record herein, Plaintiffs, by and through their undersigned counsel, will  
respectfully move this Court, before the Honorable P. Kevin Castel, United States District Judge, at

the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date and time to be set by the Court, for an order granting Plaintiffs' motion for preliminary approval of the (1) Settlement between Plaintiffs and Deutsche Bank AG and DB Group Services (UK) Ltd.; and (2) proposed Class Notice of the settlements with Barclays plc, Barclays Bank plc, Barclays Capital Inc., HSBC Holdings plc, HSBC Bank plc, Deutsche Bank AG, and DB Group Services (UK) Ltd., and for other relief set forth in the proposed order annexed hereto.

Dated: June 12, 2017  
White Plains, New York

By: /s/ Vincent Briganti  
Vincent Briganti  
Geoffrey Horn  
Peter D. St. Phillip  
LOWEY DANNENBERG, P.C.  
44 South Broadway, Suite 1100  
White Plains, New York 10601  
Tel: (914) 997-0500  
Fax: (914) 997-0035  
*rbriganti@lowey.com*  
*ghorn@lowey.com*  
*pstphillip@lowey.com*

By: /s/ Christopher Lovell  
Christopher Lovell  
Gary S. Jacobson  
LOVELL STEWART HALEIAN JACOBSON LLP  
61 Broadway, Suite 501  
New York, New York 10006  
Tel: (212) 608-1900  
Fax: (212) 719-4677  
*clovell@lshllp.com*  
*gjacobson@lshllp.com*

*Counsel for Plaintiffs*